

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REX - REAL ESTATE EXCHANGE, INC.,
Plaintiff,
v.
ZILLOW, INC., et al.,
Defendants.

Case No. 2:21-CV-00312-TSZ

DECLARATION OF RYAN DUFFEY
IN SUPPORT OF ZILLOW
DEFENDANTS' UNOPPOSED
MOTION TO SEAL

NOTE ON MOTION CALENDAR:
September 1, 2023

DECLARATION OF RYAN DUFFEY IN
SUPPORT OF ZILLOW DEFENDANTS'
MOTION TO SEAL
2:21-CV-00312-TSZ

ORRICK, HERRINGTON & SUTCLIFFE LLP
401 Union Street, Suite 3300
Seattle, Washington 98101
+1 206 839 4300

1 I, Ryan Duffey, hereby declare:

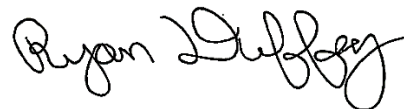
2 1. I am a Senior Paralegal for Zillow Group, Inc. I have personal knowledge of
3 the facts set forth in this declaration. For the facts of which I do not have direct personal
4 knowledge, they are based upon information and belief, and I believe them to be true.

5 2. Exhibits 1–5 to the Declaration of Jesse Beringer Attaching Deposition
6 Designations contain testimony regarding strategic planning as well as statements that
7 implicate potential strategic decisions Zillow may make in the future, that, if publicly
8 disclosed, would put Zillow at a competitive disadvantage as competitors would gain
9 confidential information regarding Zillow’s future business plans and potential future strategic
10 decisions.

11 3. Exhibits 1–5 to the Declaration of Jesse Beringer Attaching Deposition
12 Designations also contain references to the names of third parties, the disclosure of which
13 would potentially harm the third party’s privacy, and harm Zillow’s business relationships
14 with those third parties.

15 I declare under penalty of perjury under the laws of the United States of America that
16 the foregoing is true and correct.

17 Executed on this 1st day of September 2023 in Scottsdale, Arizona.

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20 _____
21 Ryan Duffey
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